

Gene
File



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

JAN 18 1990

MEMORANDUM

SUBJECT: Litton Industries (MOD007152903)

FROM: Bob Stewart, RCRA/PRMT

TO: File

Gene Evans and I reviewed the subject file for a clean closure evaluation per RCRA 3005(i). The following is a brief chronology of the facility:

- ° Litton attained interim status in November 1980 for F006 waste in a surface impoundment.
- ° In March 1982, MDNR ordered Litton to cease the hazard of this impoundment, and both MDNR and EPA issued emergency permits for its closure. Litton discontinued discharge of wastes to the pond.
- ° The closure plan was approved August 10, 1982. Since supernatant had already been removed, the plan covered removal of sludges and contaminated soils. EP toxic standards for lead, chromium and nickel, and a total lead standard of 150 mg/kg were set.
- ° Closure was completed and the certification submitted on October 27, 1982. The certification states last receipt of waste in the pond was March 1982.
- ° EPA by letter accepted the closure on November 10, 1982, and after requesting a correction to the report, MDNR did likewise in January 1983.

One of two requirements must be met before 3005(i) can be invoked to reevaluate previous clean closures: (1) the unit must have received waste after July 26, 1982, or (2) closure must have occurred after January 26, 1983. Neither of these requirements are met at Litton, and therefore EPA has no authority under 3005(i) to reconsider this clean closure. Litton should be removed from the TSD universe and listed as a generator only, since interim status was terminated on March 8, 1984.

cc: Dan Tschirgi, MDNR
Mark Rivas, RCOM
Jane Ratcliffe, RADM



R00337387
RCRA RECORDS CENTER



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

JAN 18 1990

MEMORANDUM

SUBJECT: Litton Industries (MOD007152903)

FROM: *Bob S*
Bob Stewart, RCRA/PRMT

TO: File

Gene Evans and I reviewed the subject file for a clean closure evaluation per RCRA 3005(i). The following is a brief chronology of the facility:

- Litton attained interim status in November 1980 for FO06 waste in a surface impoundment.
- In March 1982, MDNR ordered Litton to cease the hazard of this impoundment, and both MDNR and EPA issued emergency permits for its closure. Litton discontinued discharge of wastes to the pond.
- The closure plan was approved August 10, 1982. Since supernatant had already been removed, the plan covered removal of sludges and contaminated soils. EP toxic standards for lead, chromium and nickel, and a total lead standard of 150 mg/kg were set.
- Closure was completed and the certification submitted on October 27, 1982. The certification states last receipt of waste in the pond was March 1982.
- EPA by letter accepted the closure on November 10, 1982, and after requesting a correction to the report, MDNR did likewise in January 1983.

One of two requirements must be met before 3005(i) can be invoked to reevaluate previous clean closures: (1) the unit must have received waste after July 26, 1982, or (2) closure must have occurred after January 26, 1983. Neither of these requirements are met at Litton, and therefore EPA has no authority under 3005(i) to reconsider this clean closure. Litton should be removed from the TSD universe and listed as a generator only, since interim status was terminated on March 8, 1984.

cc: Dan Tschirgi, MDNR
Mark Rivas, RCOM
Jane Ratcliffe, RADM

Li Hon file

original Part A F006, 7, 8, 9 in S04
revised 82 F006 in S04
revised 4/83 generator only (closure approval 11-10-82)
IS terminated 3/84

GW wells to be installed by 4-9-82

³⁰⁸⁷
EPA letter 2-17-82 - response said state was reviewing

3-18-82 MONR orders Li Hon to cease the hazard of A pond

3-24-82 EPA emergency permit to land treat the effluent & send to POTW

3-26-82 MONR, too - also required closure plan to address sludge & soil removal by 4/82

4-7-82 EPA comments on closure

4-13-82 revised plan received

1. Gwm plan still pending

2. March 82 - Li Hon discontinued discharge eff water to A pond

May 10 82 - A pond water to be removed

2 months to close

4-22-82 Shiel memo says lagoon not receiving wastes - Li Hon has 2 wells, not drains.

6-17-82 Revised C.P. - wastewater out by 7/31, closure 2 months

6-17-82 MONR Order - no more spray irrigation - new CP, sludge out by 9-15-82

6-30-82 CP - will handle sludge as HW

8-10-82 Conditional CP Approval noticed 8-16

9-1-82

Karen agreed to 150 mg/kg Pb

certification submitted 10-27-82 - March 82 last discharge to pond

we thought OK 11-8-82

EPA letter 11-10-82 approved closure

MONR comments on cert 1-18-83 revised Table 1 - mainly corrections

co. responded 1-25-83 w/ corrected pages

requested Gen only status 4-5-83

Terminated IS 3-8-84

Litton		
requirements applicable to units which received waste after	7-26-82	March 82
	or which had not closed by	Nov 82

∴ we cannot invoke 3005(i)

JAN 18 1990

MEMORANDUM

SUBJECT: Litton Industries (MOD007152903)

FROM: Bob Stewart, RCRA/PRMT

TO: File

Gene Evans and I reviewed the subject file for a clean closure evaluation per RCRA 3005(i). The following is a brief chronology of the facility:

- ° Litton attained interim status in November 1980 for F006 waste in a surface impoundment.
- ° In March 1982, MDNR ordered Litton to cease the hazard of this impoundment, and both MDNR and EPA issued emergency permits for its closure. Litton discontinued discharge of wastes to the pond.
- ° The closure plan was approved August 10, 1982. Since supernatant had already been removed, the plan covered removal of sludges and contaminated soils. EP toxic standards for lead, chromium and nickel, and a total lead standard of 150 mg/kg were set.
- ° Closure was completed and the certification submitted on October 27, 1982. The certification states last receipt of waste in the pond was March 1982.
- ° EPA by letter accepted the closure on November 10, 1982, and after requesting a correction to the report, MDNR did likewise in January 1983.

One of two requirements must be met before 3005(i) can be invoked to reevaluate previous clean closures: (1) the unit must have received waste after July 26, 1982, or (2) closure must have occurred after January 26, 1983. Neither of these requirements are met at Litton, and therefore EPA has no authority under 3005(i) to reconsider this clean closure. Litton should be removed from the TSD universe and listed as a generator only, since interim status was terminated on March 8, 1984.

cc: Dan Tschirgi, MDNR
Mark Rivas, RCOM
Jane Ratcliffe, RADM

WSTM:RCRA:PRMT:RSTEWART:LH:X658:1-17-90:FILE LITTONRL.117

PRMT
STEWART

PRMT
EVANS

PRMT
HARRINGTON

RLS
1-16

LR
1-16-90

LH
1-17-90